

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

DRAFT PERMIT NO. F-06-011  
KUTTAWA PLASTICS  
501 LAKESHORE DRIVE, KUTTAWA, KENTUCKY  
NOVEMBER 06, 2005  
PLANT I.D. # 021-143-00002  
AI NUMBER: 15691  
ACTIVITY NUMBER: APE20050001  
FROUGH SHERWANI, REVIEWER

**SOURCE DESCRIPTION:**

The Kuttawa Plastics is a manufacturing plant located in Kuttawa Kentucky, which produces plastic OEM parts for automobile industry. The parts are molded from ABS, Nylon, Polypropylene, Acrylic and Polycarbonate plastics. The source has 15 Emblem spray machines, two (2) back coat spray booths, Four (4) acrylic injection molding machines, and one bake oven to dry parts.

On June 15, 2001, the source submitted a Title V permit application.

On March 31, 2003, the source submitted an application for a name change (from Diversified Decorative Plastics, LLC to Kuttawa Plastics).

On August 17, 2005 the source submitted an application for the conditional major permit due to the removal of some emission points. The source had coverage under 401KAR 50:031

**COMMENTS:**

**Type of control and efficiency:**

All the 15 spray machines and both spray booths have fabric filters to control particulate matter. The control efficiency of the filter is assumed to be 90%.

**Emission factors and their source:**

AP -42 5<sup>th</sup> edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

### **APPLICABLE REGULATION:**

- a. **401 KAR 59:010**, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975);
- b. **401 KAR 63:020**; Potentially hazardous matter or toxic substances, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.
- c. **401 KAR 52:030**. Federally-enforceable permits for nonmajor sources.

### **PRECLUDED REGULATIONS:**

**40CFR 63 Subpart PPPP**- National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

### **EMISSION AND OPERATING CAPS DESCRIPTION:**

- a. The source has accepted a facility-wide cap on annual VOC emissions of no more than 30.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- b. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 3.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- c. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 7.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.